

Jeffrey A. Lipps (admitted *pro hac vice*)
Jennifer A.L. Battle
David A. Beck (admitted *pro hac vice*)
CARPENTER LIPPS & LELAND LLP
1540 Broadway, Suite 3710
New York, NY 10036
Phone: (212) 837-1110

Special Litigation Counsel to the ResCap Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**STIPULATION AND NOTICE OF ADJOURNMENT OF HEARING ON
DEBTORS' FIFTY-SECOND OMNIBUS OBJECTION TO CLAIMS (INSUFFICIENT
DOCUMENTATION) SOLELY AS IT RELATES TO THE CLAIMS FILED
BY UBS REAL ESTATE SECURITIES INC. TO MARCH 26, 2014 AT 10:00 A.M.**

PLEASE TAKE NOTICE that the hearing on the *Debtors' Fifty-Second Omnibus Objection to Claims (Insufficient Documentation)* [Docket No. 6074] (the "Objection"), previously scheduled to be heard on February 20, 2014 at 10:00 A.M. (Prevailing Eastern Time), solely as it relates to the proofs of claim filed by UBS Real Estate Securities Inc. ("UBS") (Claim Nos. 4200 and 4453), has been adjourned by mutual agreement to **March 26, 2014 at 10:00 a.m. (Prevailing Eastern Time)** and will be heard before the Honorable Martin Glenn at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Room 501, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that UBS intends to respond in writing to the Debtors' prior requests for documents dated July 18, 2013 and January 10, 2014, and produce

additional documents that support UBS's proofs of claim, by no later than **February 26, 2014 at 5:00 p.m. (Prevailing Eastern Time)**. The parties will negotiate in good faith to resolve any confidentiality issues prior to that time, but to the extent such issues remain open as of the February 26 deadline, UBS will nonetheless produce the additional documents to the ResCap Liquidating Trust and its counsel solely for the purpose of addressing the proofs of claim filed by UBS, until an appropriate protective order is entered. UBS's production of additional documents shall not be construed as an admission that UBS has not previously produced sufficient documentation for its proofs of claim.

PLEASE TAKE FURTHER NOTICE that the ResCap Liquidating Trust's reply in connection with the Objection shall be filed by **March 12, 2014 at 5:00 p.m. (Prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that nothing herein shall prejudice the right of the ResCap Liquidating Trust to withdraw the Objection or file an objection to Claim Nos. 4200 and 4453 on any grounds not raised in the Objection. Nothing contained herein shall prejudice the right of UBS to file a response to any such additional objection.

Dated: February 18, 2014

/s/ David A. Beck
Jeffrey A. Lipps (admitted *pro hac vice*)
lipps@carpenterlipps.com
Jennifer A.L. Battle
battle@carpenterlipps.com
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